

EXHIBIT 14

JILL CRONAUER
9/30/2021

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	No. 20-cv-00983-TSZ
)	
CITY OF SEATTLE,)	
)	
Defendant.)	

Videotaped ZOOM 30(b)6 Deposition
Of
JILL CRONAUER

CONTENTS DESIGNATED CONFIDENTIAL

DATE: Thursday, September 30, 2021

REPORTED BY: Mindy L. Suurs, CSR No. 2195

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1 Capital claims in this lawsuit with regard to its own
2 damages?

3 A. Total cost here on L 151, which is 7.789423 and
4 88 cents.

5 Q. Could you repeat the line number, please?

6 A. L 151.

7 Q. Okay. And the total amount claimed is 3.787; is
8 that correct?

9 A. That's correct.

10 Q. Okay.

11 MR. REILLY-BATES: And that's millions; right?

12 A. Yes.

13 MR. FARMER: That's what it appears to be.

14 Q. Ms. Cronauer, does Hunters Capital have an
15 agreement with any entities of how it would distribute any
16 of the 3.7 million or so if it were to recover that amount
17 in this lawsuit?

18 A. Not to my knowledge.

19 Q. Okay. So starting with some more general buckets
20 here, is it correct that Hunters Capital claims a total of
21 \$26,470 in fiscal damages?

22 MR. REILLY-BATES: Counsel, is there a line that
23 you want to refer us to?

24 MR. FARMER: I think it's the -- it's probably
25 the physical damage and PR allocation.

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1 A. Yes.

2 Q. And so what were the terms of the settlement with
3 The Riveter?

4 A. That they could leave their lease early and we
5 would let them out of their lease even though they owed
6 this amount at the time of writing it off.

7 Q. And was it your understanding that The Riveter
8 vacated space due to the impact of CHOP?

9 A. To some extent, yes, I think --

10 Q. Okay --

11 A. Yeah, I think this is where, you know, initially,
12 similar to some of our other -- our other tenants, there
13 was a COVID initial impact because they couldn't be open,
14 like we've discussed; and then in June when they could
15 access their premise, this building was entirely blocked,
16 and The Riveter -- I don't know if you're familiar with how
17 it functions, but the purpose of this location and this
18 lease is not for their employees, but rather people come in
19 and access the space for use, and they couldn't access the
20 space for use, and it was deemed unsafe.

21 Q. Okay. And when was it first deemed to be unsafe?

22 A. I don't recall.

23 Q. Do you recall when it was once again deemed to be
24 safe?

25 A. They left, and we allowed them to leave before

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1 And so this is just demonstrating that, you know,
2 if we had a couple months or even one month of no rental
3 income, that we would be out of covenant, that it's
4 actually on an annual cumulative basis. Yeah, there's all
5 sorts of ideas at this point on how to handle COVID.

6 Q. Undoubtedly. All right. Just a couple more, if
7 you would bear with me. If you could please turn to
8 Tab M2, as in Michael, 2.

9 (Exhibit No. 80 marked for
10 identification.)

11 A. I have it in front of me.

12 BY MR. FARMER:

13 Q. And can you identify Exhibit 80 as a letter that
14 you received from Amy Nelson of the Riveter?

15 A. Correct.

16 Q. And does this letter refresh your recollection
17 that the Riveter was severely impacted by COVID-19?

18 A. I think we discussed that because of their
19 business model, their inability to have people come in when
20 it was a shutdown because they weren't allowed to for two
21 months, was impactful. Yeah, I don't recall the letter,
22 though, actually.

23 Q. Okay. If you look down in the last full
24 paragraph that begins with "Nonetheless," three or four
25 sentences into that she writes: "Alternatively, we propose

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SIGNATURE

I declare that I have read my within deposition,
taken on Thursday, September 30, 2021, and the same is true
and correct save and except for changes and/or corrections,
if any, as indicated by me on the "CORRECTIONS" flyleaf
page hereof.

Signed in _____, Washington,
this _____ day of _____, 2021.

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REPORTER'S CERTIFICATE

I, Mindy L. Suurs, the undersigned Certified Court
Reporter, pursuant to RCW 5.28.010, authorized to
administer oaths and affirmations in and for the State of
Washington, do hereby certify:

That the foregoing testimony of JILL CRONAUER
was given before me at the time and place stated therein
and thereafter was transcribed under my direction;

That the sworn testimony and/or proceedings were by me
stenographically recorded and transcribed under my
supervision, to the best of my ability;

That the foregoing transcript contains a full, true,
and accurate record of all the sworn testimony and/or
proceedings given and occurring at the time and place
stated in the transcript;

That the witness, before examination, was by me duly
sworn to testify the truth, the whole truth, and nothing
but the truth;

That I am not a relative, employee, attorney, or
counsel of any party to this action or relative or employee
of any such attorney or counsel and that I am not
financially interested in the said action or the outcome
thereof;

DATE: October 3, 2021

Mindy L. Suurs
Mindy L. Suurs
Certified Court Reporter #2195



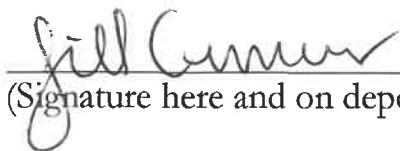
47 (Pages 185 to 186)



206.682.1427 fax 206.937.6236

Please record any changes or corrections on this sheet, indicating page number, line number, and reason for the change.

<u>Page</u>	<u>Line</u>	<u>Correction and Reason</u>
9	7	Should read '500' instead of '900'
9	22	Should read 'Kei' instead of 'Key'
12	3	Should read 'J' instead of 'Jim'
12	4	Should read 'Kieran Oaksmith' instead of 'Karen Malone'
12	4	Should read 'Cristin' instead of 'Kristen'
18	2	Should read 'small business loan' instead of NSBA loan'
70	17	Should read 'and' instead of 'in'
109	19	Should read 'Amaan' instead of 'Ahman'
122	15	Should read 'Paparepas' instead of 'Papa Repas'
177	16	Should read 'for your mortgage' instead of 'and your rent'


 (Signature here and on deposition)

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S I G N A T U R E

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and correct save and except for changes and/or corrections,
if any, as indicated by me on the "CORRECTIONS" flyleaf
page hereof.

Signed in Seattle, Washington,
this 1 day of November, 2021.


JILL CRONAUER

ROUGH & ASSOCIATES INC

office@roughandassociates.com

206.682.1427 3515 SW Alaska St Seattle WA 98126